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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 12-0390 WHA
Plaintiff,)	STIPULATION AND
)	[PROPOSED] INTERIM PROTECTIVE
v.)	ORDER
NICOLAS PERRET,)	
Defendant.)	

Plaintiff, United States of America, by and through MELINDA HAAG, United States Attorney for the Northern District of California, and OWEN P. MARTIKAN, Assistant United States Attorney for the Northern District of California, and the defendant, NICOLAS PERRET, and his attorneys PAULA CANNY and JUSTIN GOODWIN, hereby stipulate and agree as follows:

WHEREAS the defendant is charged in a four-count Indictment with violations of Title 18, United States Code, sections 2251(a) and 2252(a)(1). In connection with this Indictment, the United States is in possession of police reports, HSI reports, other documents and media that

1 identify the alleged child victims in this case.

2 WHEREAS pursuant to Title 18, United States Code, section 3509(d), an Attorney for the
3 Government is required to take measures to maintain the confidentiality of documents and other
4 materials that disclose the identity of a child victim or witness, including the preparation of a
5 proposed protective order that may "provide for any other measures that may be necessary to
6 protect the privacy of the child" victim or witness. 18 U.S.C. § 3509(d)(3).

7 WHEREAS in order to comply with Title 18, United States Code, section 3509(d), and to
8 allow the defendant the greatest opportunity to prepare an effective defense in preparation for
9 trial in this matter, the United States and defendant agree that disclosure of the recorded
10 interviews covered hereunder are subject to the following restrictions:

11 IT IS HEREBY STIPULATED AND AGREED:

12 1. The provisions of this Interim Protective Order apply to all documents, video recordings,
13 audio recordings, and pictures or photographs produced by the United States in this case that
14 identify or depict the alleged child victims in this case.

15 2. The following individuals (the "defense team") may obtain and examine any material
16 identified in paragraph one, above, under the conditions set forth herein for the sole purpose of
17 preparing the defense and for no other purpose:

- 18 a. Counsel for defendant;
- 19 b. Persons employed by defense counsel who are assisting with the preparation of
20 the defense;
- 21 c. Defendant, but only in the presence of his/her attorney;
- 22 d. Any expert retained on behalf of the defendant to assist in the defense of this
23 matter;
- 24 e. Any investigator retained on behalf of defendants to assist in the defense of this
25 matter.

26 3. Members of the defense team agree to treat any documents described in paragraph one,
27 above, as confidential, meaning that they will not be shared with anyone outside the defense team
28 without stipulation of the parties or a Court order, that they will not be included in any public

findings, either in summary, in part, or as exhibits or attachments, and that they identities of the alleged child victims in this case will not be revealed to anyone outside the defense team without the stipulation of the parties or a Court order.

4. Members of the defense team agree to destroy or return to the United States any documents or other media covered by this Interim Protective Order at the end of this litigation.

SO STIPULATED:

DATED: 5/29, 2012

MELINDA HAAG
United States Attorney

OWEN P. MARTIKAN
Assistant United States Attorney

DATED: May 29, 2012

PAULA CANNY JUSTEN GOODWIN
Attorney for Defendant Nicolas Perret

SO ORDERED.

DATED: 4/ 5/29/12

HON. WILLIAM H. ALSUP
United States District Court Judge